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February 16, 2022

Via ECF

Judge Edgardo Ramos  
United States District Court, Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: PT Aurora Indonesia Trading and Jin Maa Trading Limited v. USARM Group, LLC; Case # 20-CV-07045 (er)

Dear Judge Ramos:

This office represents plaintiffs PT Aurora Indonesia Trading and Jin Maa Trading Limited (collectively, “Plaintiffs”), in the above referenced adversary action. I am writing with you with defendant USARM Group, LLC’s (“USARM”) knowledge and consent.

As it represented at the status conference on February 2, 2022, USARM’s counsel advises me that USARM is actively working to file for bankruptcy or liquidation in the immediate future. I have been further advised that Bankruptcy counsel has been engaged and work is underway to prepare the filing. USARM will file a suggestion of bankruptcy as soon as possible.

As Your Honor directed, the parties propose, and request the Court to order, the following schedule for the completion of discovery in this matter:

USARM to produce documents in response to Plaintiffs’ discovery demands by April 30, 2022.

Depositions shall be completed by July 10, 2022.

Any further interrogatories, including expert interrogatories, shall be served no later than May 1, 2022.

Requests to Admit, if any, shall be served no later than August 10, 2022.

Expert reports shall be served no later than August 10, 2022.

Rebuttal expert reports shall be served no later than September 10, 2022.

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Expert depositions shall be completed by October 10, 2022.

ALL DISCOVERY SHALL BE COMPLETED BY October 10, 2022.

If you have any questions or require any additional information, please let me know. Thank you.

Respectfully Submitted ,

*s/ Eric P. Schutzer*

Eric P. Schutzer, Esq.

cc: Alex Mirkin, Esq.